

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

JESSICA DE LA ROSA, JEAN RYAN,  
BRONX INDEPENDENT LIVING  
SERVICES, BROOKLYN CENTER FOR  
INDEPENDENCE OF THE DISABLED,  
CENTER FOR INDEPENDENCE OF THE  
DISABLED, NEW YORK, DISABLED IN  
ACTION OF METROPOLITAN NEW YORK,  
HARLEM INDEPENDENT LIVING  
CENTER, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

-against-

METROPOLITAN TRANSPORTATION  
AUTHORITY, JANNO LIEBER, in his official  
capacity as chair and chief executive officer of  
the Metropolitan Transportation Authority,  
NEW YORK CITY TRANSIT AUTHORITY,  
RICHARD DAVEY, in his official capacity as  
President of the New York City Transit  
Authority, and the CITY OF NEW YORK,

Defendants.

No. 19-cv-4406 (ER)

**NOTICE OF MOTION FOR**  
**FINAL APPROVAL OF**  
**CLASS SETTLEMENT**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT Plaintiffs will and hereby do move this Court for an  
order granting final approval of the proposed Settlement Agreement.

This Motion is based upon this Notice; the accompanying Memorandum of Law; the  
declaration of Chloe Holzman; all pleadings and other documents on file in this action; all  
matters of which the Court may or must take judicial notice, and any argument or evidence that  
may be presented at the Fairness Hearing in this matter.

Dated: March 17, 2023  
Brooklyn, New York

DISABILITY RIGHTS ADVOCATES

s/ Chloe Holzman

Chloe Holzman  
Rebecca Rodgers  
Torie Atkinson  
655 Third Avenue, 14th Floor  
New York, NY 10017  
Tel: (212) 644-8644  
Fax: (212) 644-8636  
cholzman@dralegal.org  
rrodgers@dralegal.org  
tatkinson@dralegal.org

Jelena Kolic  
300 South Wacker Drive, Floor 32  
Chicago, IL 60603  
Tel: (312) 559-4660 Ext. 7560  
Fax: (212) 644 8636  
jkolic@dralegal.org

Stuart Seaborn  
2001 Center Street, 4th Floor  
Berkeley, CA 94704  
Tel: (510) 665-8644  
Fax: (510) 665-8511  
sseaborn@dralegal.org

*Attorneys for Plaintiffs*

Respectfully submitted,

SHEPPARD, MULLIN, RICHTER &  
HAMPTON, LLP

s/ Daniel L. Brown

Daniel L. Brown  
30 Rockefeller Plaza, 39th Floor  
New York, NY 10112  
Tel: (212) 634-3095  
Fax: (212) 653-8701  
dlbrown@sheppardmullin.com

*Attorneys for Plaintiffs*